REMARKS

This is in response to the Office Action that was mailed on July 18, 2008. Claims 1-19 were pending in that action and all claims were rejected. With the present response, claims 1-4 are cancelled, claims 5, 7-10, 12, 14-16, and 18-19 are amended, claims 20-24 are new, and the remaining claims are unchanged. Consideration and allowance of all claims are respectfully solicited in light of the following comments.

35 USC §101 Rejections

On page 2 of the Office Action, the Examiner rejected claims 5-13 under 35 USC §101. The Examiner stated that the process in claims 5-13 either needs to be tied to another statutory class or that the process needs to transform underlying subject matter. The claims have been amended such that they are tied to computers which are statutory subject matter. For example, claim 5 recites that the first computer sends a document to the second computer. Also for example, claim 7 recites that the second computer requests a copy of the process template, and claim 8 recites making a document viewable to a user. These amendments are supported throughout the application as originally filed. For example, FIG. 1 and its accompanying text show and describe a computer, and FIGS. 3 and 5 and their accompanying text show and describe two computers exchanging documents. Applicant respectfully contends that amended claims 5-13 are tied to statutory subject matter, and that accordingly, claims 5-13 satisfy the requirements of 35 USC §101. Applicant respectfully requests that the rejections be withdrawn.

35 USC §112

On page 3 of the Office Action, the Examiner rejected claims 1-19 under 35 USC §112. The Examiner stated that the limitation of "defining an action sequence for the plurality of documents" recited in the independent claims renders the claims indefinite. With the present response, each of the independent claims has been amended to make the claims definite.

Claim 5 has been amended to recite "defining an action sequence for the plurality of documents, the action sequence defining actions that are performed on the documents and a sequential order for the actions." This amendment is well supported by the application as originally filed. For example, page 19, lines 19-28 of the specification states that:

"As a result of using the process template described above, an action sequence can be defined to easily integrate and align business processes between partners. The action sequence defines what actions are performed and in what sequence. The process template can be implemented in various business environment including a company and its financier, carrier, logistics provider, etc. The service industries such as a dentist/insurance company relationship."

Also for example, page 15, lines 11-19 of the specification states that:

"Business entity module 232 defines a valid structure for entities and transaction documents associated with process template 230 for performing an action sequence to complete a business process. The structure of the entities pertains to variables, schemas, etc. that make up each of the transaction documents. The transaction documents can be created with an associated transaction document module 234 based on an entity and a defined sequence of actions."

As is stated in MPEP 2173.02, the definiteness of claim language must be analyzed, not in a vacuum, but in light of the content of the particular application disclosure. Applicant respectfully contends that claim 5 is definite in light of its support in its application disclosure. Applicant respectfully requests that the claim 5-13 rejections be withdrawn.

Claim 14 has been amended to recite "an entity action module defining valid actions that can be performed on the business entities." This amendment is well supported throughout the application as originally filed. For example, page 16, lines 20-25 of the specification states that:

"Entity action module 242 defines valid actions that can be performed on the business entities defined by business entity module 232 associated with process template 230. Such actions include originating, acknowledging and preparing business entities. Transaction documents are used to communicate actions on the business entities. For example, a customer in a supplier/customer relationship would be allowed to originate a purchase order while a supplier would be allowed to acknowledge the purchase order based on entity action module 242. Another example is when a customer would be allowed to prepare a purchase order from a price list."

The amendment is also supported for example by FIG. 5 and its accompanying text that show and describe a sequence of actions taken by a supplier and a customer in an orders-to-cash business transaction. Similar to claims 5, Applicant respectfully contends that claim 14 and its dependent claims are definite in light of the application disclosure. Applicant respectfully requests that the claim 14-19 rejections be withdrawn.

35 USC §102 and §103 Rejections

On page 3 of the Office Action, the Examiner rejected claims 1-6, 8-16, and 18-19 under 35 USC §102 as being anticipated by Meltzer et al., U.S. Pat. No. 6,125,391 (hereinafter "Meltzer"). On page 5 of the Office Action, the Examiner rejected claims 7 and 17 as being obvious in view of Meltzer. As is discussed below, Applicant respectfully contends that claims 5-19 include limitations that are not disclosed by the cited reference and that are not obvious in view of the cited reference. Because of this, Applicant respectfully contends that the claims are patentable.

Claim 5:

As was discussed previously, claim 5 has been amended to overcome the §101 and §112 rejections. Amended claim 5 recites in part identifying a plurality of documents associated with a transaction and defining an action sequence for the plurality of documents, wherein the action sequences defines the actions that are performed on the documents and a sequential order for the actions. Applicant does not believe that this is disclosed or obvious in view of Meltzer. Meltzer does not disclose a plurality of documents associated with a transaction. Meltzer only discloses one document per a transaction. Additionally, even if Meltzer did disclose multiple documents per a transaction, Meltzer does not disclose any particular order for the documents. The Examiner cites two sections of Meltzer as disclosing the above mentioned limitations. The Examiner first cites Meltzer column 84, lines 15-35. That section discloses parsing incoming XML files. That section does not state that the files are associated with one transaction, or that the files need to be processed in any particular order. The Examiner next cites Meltzer column 31, lines 25-40. That section states that the DTD specifies the format for a document such as the elements in the document and the order of the elements in

the document. That section does not disclose multiple files associated with one transaction, or any order for multiple documents associated with a transaction. Meltzer similarly does not provide any suggestion or motivation to modify its invention to include the claim 5 limitations. Applicant respectfully contends that claim 5 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claims 6 and 7:

On page 4 of the Office Action, the Examiner stated that Meltzer column 29, lines 25-55 discloses claim 6. Applicant respectfully disagrees. The closest thing to a process template in Meltzer is a business interface definition. The section of Meltzer cited by the Examiner, and the rest of Meltzer, only disclose the business interface definition being on one computer, the server. Moreover, even if Meltzer did disclose the business interface definition being on two computers, Meltzer does not disclose a version of a business interface definition or making a request if the second computer does not include the same version. Applicant also does not believe that it would be obvious to modify Meltzer to include the claim 6 and 7 limitations. Since only one computer needs the Meltzer business interface definition, nothing would be gained by modifying Meltzer to include the business interface definition on a second computer. Applicant respectfully contends that claims 6 and 7 are patentable over the cited reference, and respectfully requests that the rejections be withdrawn and the claims allowed.

Claim 8:

Claim 8 has been amended to recite that rendering comprises making the document viewable to a user and that the rendering rules define how each of the documents is rendered in various applications. This amendment is supported throughout the application as originally filed such as in the specification on page 15, line 29 to page 16, line 19.

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the document. That section does not disclose multiple files associated with one transaction, or any order for multiple documents associated with a transaction. Meltzer similarly does not provide any suggestion or motivation to modify its invention to include the claim 5 limitations. Applicant respectfully contends that claim 5 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claims 6 and 7:

Claim 6 recites checking a version identifier to see if the first computer and second computer have the same version of a process template, and claim 7 recites that the second computer requests a copy of the process template if the second computer does not have the same version as the first computer. The claim 7 amendment is supported throughout the application as originally filed such as in the specification on page 15, line 29 to page 16, line 10.

On page 4 of the Office Action, the Examiner stated that Meltzer column 29, lines 25-55 discloses claim 6. Applicant respectfully disagrees. The closest thing to a process template in Meltzer is a business interface definition. The section of Meltzer cited by the Examiner, and the rest of Meltzer, only disclose the business interface definition being on one computer, the server. Moreover, even if Meltzer did disclose the business interface definition being on two computers, Meltzer does not disclose a version of a business interface definition or making a request if the second computer does not include the same version. Applicant also does not believe that it would be obvious to modify Meltzer to include the claim 6 and 7 limitations. Since only one computer needs the Meltzer business interface definition, nothing would be gained by modifying Meltzer to include the business interface definition on a second computer. Applicant respectfully contends that claims 6 and 7 are patentable over the cited reference, and respectfully requests that the rejections be withdrawn and the claims allowed.

Claim 8:

Claim 8 has been amended to recite that rendering comprises making the document viewable to a user and that the rendering rules define how each of the documents is rendered in various applications. This amendment is supported throughout the application as originally filed such as in the specification on page 15, line 29 to page 16, line 19.

On page 4 of the Office Action, the Examiner stated that the claim 8 rendering limitation was disclosed by Meltzer column 23, lines 55-60 and column 81, lines 35-40. The first section cited by the Examiner discloses parsing a document. Applicant does not believe that parsing and rendering are the same, however parsing clearly does not comprise making the document viewable to a user as is recited in amended claim 8. The second section cited by the Examiner discloses displaying a purchase order in a web browser. Although that section does disclose making a document viewable to a user, that section does not disclose various applications (it only discloses one) or how documents are disclosed in various applications. Applicant respectfully contends that neither the cited sections nor any other section of Meltzer disclose or make obvious the claim 8 limitations. Applicant respectfully contends that claim 8 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claim 9:

Claim 9 has been amended to recite defining actions that can be performed on each of the documents, wherein the first computer can perform a first set of actions and that the second computer can perform a second set of actions. The claim 9 amendment is supported throughout the application as originally filed such as in the specification on page 16, line 25 to page 19, line 29. For example, an illustrative embodiment is described wherein a supplier can create a price list and acknowledge an order, and a customer can create an order based on the price list.

On page 4 of the Office Action, the Examiner stated that claim 9 was disclosed by Meltzer column 84, lines 15-35 and column 31, lines 25-40. Applicant respectfully contends that at least as amended that claim 9 is not disclosed by Meltzer. The first section cited by the Examiner describes the market maker node parsing documents. That section does not describe any actions taken on those documents by a second computer. The second section by the Examiner only discloses the preferred formatting or layout of documents. It does not disclose any action taken on the documents by any computer. Applicant similarly does not see any suggestion or motivation in Meltzer to include the claim 9 limitations. Applicant respectfully

contends that claim 9 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claim 10:

Claim 10 has been amended to recite that the relationship between the first computer and the second computer comprises the first computer having a process template and the second computer having a copy of the process template. This amendment is supported throughout the application as originally filed such as by FIG. 5 and its accompanying text. Applicant does not believe that any of the Meltzer computers have a relationship to any of the other Meltzer computers. For example, Meltzer column 31, lines 23-26 states "[i]n effect, the company is promising to do business with anyone who can submit a Purchase Order that conforms to the XML specification it declares. No prior arrangement is necessary." Meltzer certainly does not disclose the specific relationship recited in claim 10. Applicant respectfully contends that claim 10 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claim 12:

Claim 12 has been amended to recite that one of the plurality of documents is validated before it is sent to the second computer. This amendment is supported throughout the application as originally filed such as in the specification on page 12, lines 20-24. Meltzer does not disclose any similar type of validation before sending a document, and there is no suggestion or motivation to modify Meltzer to include the limitation. Applicant respectfully contends that claim 12 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claim 14:

Claim 14 was amended to overcome the §112 rejection. Those amendments are discussed above in the §112 rejection section. Claim 14 has also been amended to recite that information entered into the transaction documents and actions performed on the business entities are validated against the process template before an exchange between the first and second computers. This amendment is supported throughout the application as originally filed

such as in the specification on page 12, lines 20-24. Applicant believes that this limitation is patentable at least for the same reasons as why claim 12 is patentable.

On page 5 of the Office Action, the Examiner stated that claim 14 is rejected as being anticipated for the same reasons as claims 5-6 and 8-13. Claim 14 recites that a first computer has a memory including a process template and that a second computer has a memory including a copy of the process template, and that actions are performed based on the process template and a relationship between the first computer and the second computer. Applicant respectfully contends that claims 5-6 and 8-13 do not include these claim 14 limitations. Therefore, the Examiner has failed to make a *prima facie* case for anticipation as is required in rejecting the claims. More importantly, Meltzer does not disclose any similar concept that is included in two computing devices. Meltzer only discloses a business interface identification that is stored on only one computer. Applicant respectfully contends that claim 14 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claim 16 and 17:

Claim 16 has been amended to recite a version identifier for a process template. This amendment is supported throughout the application as original filed such as in the specification on page 15, line 29 to page 16, line 10.

Claims 16 and 17 are similar to claims 6 and 7, and Applicant respectfully contends that they are patentable for at least the same reasons. Additionally, on pages 5-6 of the Office Action, the Examiner stated that the claim 17 process template would be obvious to include in Meltzer in order to meet the needs of business partners. Applicant respectfully disagrees. Meltzer discloses that it meets the needs of business partners without a process template. Additionally, adding a process template to Metlzer would not be obvious because Meltzer teaches away from several features of the claimed process templates such as only including the business interface definition on one computer, not including version identifiers, and not validating an action against a process template.

For at least the reasons discussed above, Applicant respectfully contends that claims 16 and 17 are patentable over the cited reference. Applicant respectfully requests that the rejections be withdrawn and the claims allowed.

Claim 19:

Claim 19 has been amended to recite that the valid actions that can be performed on the business entities depend upon an identify of the user. Several illustrative embodiments of this limitation are given in the specification on page 16, line 25 to page 19, line 29. For example, a situation is described wherein a supplier can create a price list and acknowledge an order, and a customer can create an order based on the price list. Applicant respectfully contends that this limitation is not disclosed or obvious in view of Meltzer. Metlzer does disclose users having different identities. For example, Meltzer FIG. 1 shows market participants and market makers. Meltzer however never discloses that any of the actions that can be taken in its system depend upon an identity. Meltzer allows for any user to perform any action. For example, Meltzer column 85, lines 16-20 states that "[t]he manner in which the content is processed by the participants in the market, and by the market maker is completely independent of the document based electronic commerce network which is established according to the present invention." Besides not disclosing the claim limitation, Meltzer teaches away from the limitation in that it teaches that the actions that can be performed should not be based on an identity. Applicant respectfully contends that claim 19 is patentable over the cited reference, and respectfully requests that the rejection be withdrawn and the claim allowed.

Claims 2-4, 11, 13, 15, and 18:

Claims 2-4, 11, 13, 15, and 18 are dependent claims. Applicant respectfully contends that these claims are patentable at least based on their dependence upon patentable independent claims. Applicant respectfully requests that the rejections be withdrawn and the claims allowed.

New Claims

Claims 20-24:

Claims 20-24 are new claims. They are all well supported throughout the application as originally filed.

Claim 20's first computer and second computer having a plurality of applications and process templates are supported for example by page 13, lines 13-16 of the specification. Claim 20's process template, business document definitions, and collaboration definitions are supported for example by page 13, line 13 to page 14, line 2 of the specification. Claim 20's reference to the process template is supported for example by page 15, lines 6-10 of the specification. Claim 20's validation of information entered against the process template is supported for example by page 12, lines 20-24 of the specification.

Claim 21's tracking, correlating, and acknowledging is supported for example by page 14, lines 6-10 of the specification.

Claim 22 and 23's requesting and sending a copy of a process template is supported for example by page 16, lines 3-7, page 18, lines 6-10, and page 12, lines 10-13 of the specification.

Claim 24's email program and spreadsheet program are supported for example by page 16, lines 11-19 and page 17, lines 26-29 of the specification.

Applicant respectfully contends that these claims have limitations that are not anticipated or obvious in light of the cited reference. For example, claim 20 recites a plurality of process templates on a first computer and at least one of the plurality of process templates on the second computer. The cited reference does not disclose a first computer having a plurality of process templates, and it does not disclose a second computer having at least one of the plurality. Also for example, claim 20 recites that each of the transaction documents includes a reference to the process template, and claim 21 recites that the reference is used in tracking, correlating, and acknowledging. Meltzer does not include a reference to a process template, and it certainly does not include a reference used in tracking, correlating, and acknowledging. Also for example, claims 22 and 23 recite that the second computer requests a second process template and that the first computer sends a second process template. In Meltzer, the second computer does not even have or request one process template, it certainly does not request a second process template.

Applicant respectfully contends that claims 20-24 are patentable over the cited reference, and respectfully requests that they be allowed.

Conclusion

It is respectfully submitted that claims 1, 5-10, 12, 14, 16-17, 19, and 20-24 are patentably distinguishable over the cited references. It is also respectfully submitted that claims 2-4, 11, 13, 15, and 18 are patentable at least based on their dependence upon patentable independent claims. Accordingly, consideration and allowance of all pending claims are respectfully solicited. The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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